MGM McCullough Ginsberg Montano & Partners

A Limited Liability Partnership Formed in the State of New York

Partners

Ted McCullough, Esq. *
Simon Ginsberg, Esq. *
James S. Montano, Esq. *† *
C. Dino Haloulos, Esq. **

- † Admitted in NJ
- * Admitted in PA
- * Admitted in NY

Of Counsel

Jason Liam Schmolze, Esq. † Michele J. Mittleman, Esq. *

Associates

Kara Halpern, Esq. *
Robert B. Lower, Esq. *
Patrick Lynott, Esq. *†

Robert B. Lower Direct: (646) 747-6895 rlower@mgpllp.com

February 8, 2019

VIA ECF

Hon. Paul E. Davison United States Magistrate Judge United States Courthouse 300 Quarropas Street, Courtroom 420 White Plains, NY 10601

Re: William Gunnar Truitt v. Salisbury Bank and Trust Company, et al.

Index No. 7:18-cv-08386-NSR-PED

Dear Judge Davison:

We completed an uninterrupted 45-minute meet and confer with counsel for Defendants on February 4, 2019 and discussed every discovery request raised in our February 5, 2019 letter to Your Honor during that call. We also discussed every proposed limitation to Interrogatory No. 10 that Defendants recited in their February 5 letter to Your Honor during that call. Although we remain willing to meet and confer with Defendants regarding any request before the hearing, our requests regarding Interrogatory Nos. 1, 3, 10, 14, 15, and 16 are still outstanding. Finally, if Your Honor would permit me to attend the February 15, 2019 hearing telephonically, it would be greatly appreciated (allowing me to preserve a plan to visit family in Colorado).

Sincerely,

Robert B. Lower MCCULLOUGH GINSBERG MONTANO & PARTNERS LLP 122 East 42nd Street, Suite 3505

New York, New York 10168 Phone: (646) 747-6895 rlower@mgpllp.com Counsel for Plaintiff

cc: Ted McCullough and Jim Coughlan (counsel for Mr. Truitt) Lindsay M. Sorin and Amber M. Spataro (counsel for Defendants)